

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Children's Television Obligations)	MM Docket No. 00-167
of Digital Television Broadcasters)	
)	

**REPLY COMMENTS OF
THE WALT DISNEY COMPANY AND ABC, INC.**

The Walt Disney Company and its indirect wholly owned subsidiary ABC, Inc. submit these reply comments in response to the comments of the Children's Media Policy Coalition ("CMPC") in the above-referenced proceeding. ABC, Inc., directly and through subsidiary companies, owns and operates the ABC Television Network as well as ten broadcast television stations across the country. The ABC Television Network currently provides its owned and affiliated stations with a four-hour weekly Saturday morning block of children's programs called *ABC Kids*, three hours of which it designates "core" educational and informational ("E/I") programming.

In its comments CMPC requests dramatic changes in the definition of E/I programming and in rules regarding acceptable scheduling and promotion of such programs. It asks that the Commission's longstanding rules, which wisely define E/I programming as programming that addresses either the social/emotional or the cognitive/intellectual needs of children, be changed to require that every broadcaster provide some programming that teaches academic skills such as reading, writing or

arithmetic. It also asks that the rule permitting educational and informational “core” programming to air any day of the week between 7 AM and 10 PM be revised to require that every broadcaster schedule some of its core programming for weekdays rather than weekends.

This departure from longstanding Commission rules is unwarranted. The existing rules appropriately recognize the value of pro-social as well as academic programming and weekend as well as weekday programming. And with access to network-affiliated, independent and non-commercial broadcast stations as well as round-the-clock children’s cable channels, children in fact have a wide variety of all kinds of educational programming available to them during both weekends and weekdays. (See Argument Sections I and II, below.)

CMPC also criticizes the educational content of some programming that it says was identified by network-affiliated broadcast stations as educational and informational, including programming that it claims aired on KABC-TV. In at least one case CMPC’s facts are simply wrong: an episode of *That’s So Raven* that CMPC claims KABC-TV was identifying as E/I in fact never aired on KABC-TV or *ABC Kids* and was never identified as E/I.¹

Even where its facts are correct, CMPC’s conclusions are unjustified. Based on evaluations by screeners whose identities and qualifications are not revealed, CMPC

¹ CMPC admits, in Appendix II, page 1, that it recorded three of the five alleged KABC-TV (*ABC Kids*) E/I shows off Disney Channel and not off KABC-TV. But the program episodes scheduled on Disney Channel and on *ABC Kids* are not identical. And the episode of *That’s So Raven* that CMPC criticizes was never even presented to ABC for possible approval as an E/I episode for *ABC Kids*. Moreover, while CMPC recorded only five half-hour programs for ABC, the *ABC Kids* block actually includes six half-hour E/I shows, including two separate episodes each week of *That’s So Raven*. KABC-TV’s analog schedule also includes episodes of the syndicated E/I series *Exploration with Richard Wiese* and *Teen Kids News* for which KABC-TV claims only “non-core” E/I programming credit because these programs are scheduled irregularly or during non-core hours on that channel.

opines that the pro-social messages in the two programs that it recorded off KABC-TV and the three it recorded off Disney Channel are insufficiently strong. ABC strongly disagrees with CMPC's opinion of these programs. At ABC, highly qualified educational consultants who specialize in the particular age group for which these shows are designed have reviewed every single episode of every show that has been considered for possible E/I status before it was ever approved. Our consultants have great faith in the educational value of the programming on *ABC Kids*. It is their opinion, and that of ABC's children's programming experts, that educational messages need not be heavy-handed and pedantic to be effective. In the view of ABC and these experts, programming geared to tweens is most effective at conveying pro-social messages when it presents them in an entertaining and accessible way and when it uses human, fallible characters – child and adult – to whom the tween audience can relate and from whom they can learn valuable life lessons. (See Argument, Section III below.)

ARGUMENT

I. The Commission Has Appropriately Accorded Broadcasters Flexibility to Address Children's Social/Emotional and/or Cognitive/Intellectual Needs.

The 1996 amendments to the Children's Television Act of 1990 ("CTA")², which implemented the three-hour processing guideline, specifically defined E/I programming to include "any television programming which furthers the educational and informational needs of children 16 years and under in any respect, including children's 'intellectual/cognitive' or 'social/emotional' needs." The Commission explained in the

² 47 U.S.C. §§ 393a, 303b, 394 (1990).

accompanying Report and Order³ that its definition of E/I programming was intended to encompass a “broad variety of programs”⁴ and to “provide broadcasters ample discretion in designing and producing such programming.”⁵ It specifically rejected the claim that only programming that furthers children’s “cognitive and intellectual development” counts as “educational and informational” and that programming that furthers their “social and emotional development” does not.⁶ Finally, the Commission rejected a proposal to require that the programs have education and information as a “primary purpose” and instead required that these programs have education and information only as a “significant purpose.”⁷ The Commission explained that the “significant purpose” standard “appropriately acknowledges . . . that to be successful, and thus to serve children’s needs as mandated by the CTA, educational and informational programming must also be entertaining and attractive to children.”⁸

The flexibility accorded broadcasters under this standard is appropriate and important, and it should not be changed. Children struggle with social and emotional issues at least as much as with ignorance of math or history, and pro-social messages can be at least as useful and educational to children as the more academic information and data that is imparted to them daily in school. Programming dealing with social and emotional subjects can convey important – indeed, critical – lessons to children who are confronting such issues as peer pressure, bullying, sibling rivalry, the longing for

³ In the Matter of Policies and Rules Concerning Children's Television Programming Revision of Programming Policies for Television Broadcast Stations, MM Docket No. 93-48, FCC 96-335, 11 F.C.C. Rcd. 10660, 1996 FCC LEXIS 4304, 3 Comm. Reg. (P & F) 1385 (August 8, 1996) (“1996 Report and Order”).

⁴ Id. at ¶ 79.

⁵ Id. at ¶ 80.

⁶ Id. at ¶ 87.

⁷ Id. at ¶¶ 81-82, 84.

⁸ Id. at ¶ 84.

popularity and friendship, conflicts with parents and teachers, struggles in school, and dilemmas regarding persistence, honesty, loyalty and trust.

In addition, programming geared to children's social and emotional needs, such as the programming currently shown on *ABC Kids*, is not the only children's programming in the marketplace. CMPC claims that the vast majority of programs it recorded on the analog channels of a few select, mostly network-affiliated broadcast stations in the LA area were of the pro-social rather than the academic variety, but the marketplace for children's television programming as a whole also includes that provided by non-network-affiliated broadcasters, public television stations and cable television channels that are widely watched and that regularly air more traditional academic fare, as well as on broadcasters' digital multicast channels. Commercial broadcast stations often supplement their analog network children's programming with core and non-core local and syndicated E/I programming, on either their analog or their digital multicast channel schedules, that teaches children about nature, history, geography, literature and current events.⁹ Meanwhile, public television stations continue to offer such fare as *Sesame Street*, *Reading Rainbow*, and *Barney & Friends*. And cable channels geared to children, though not required by law to distribute any E/I programming, provide programming for children around the clock, much of which is educational. This company's own Disney Channel, for example, airs a daily block of academic as well as

⁹ This year ABC-owned stations have supplemented the *ABC Kids* block with E/I programs, broadcast on their digital multicast and in some cases on their analog channels, including such quality and often award-winning shows as *Jack Hanna's Animal Adventures* (wildlife), *Exploration with Richard Wiese* (exotic worlds on land, in the sea, and in outer space), *Aqua Kids* (marine environments and the animals who live there), *Where on Earth is Carmen Sandiego?* (geography), *Whaddyado?* (demonstrating risky situations that children might face and presenting expert advice about what children confronted with such situations should do), *Teen Kids News* (current events for teens by teens), and *Connect with Kids* (interviews with and among teens and their parents and tips from medical, mental health and law enforcement experts about drinking, drugs, tobacco use, obesity, exercise, anorexia, depression, sexual activity, driving safety, bullying, peer pressure, cyberporn, internet predators and other teenage health and safety issues).

pro-social programming for preschoolers known collectively as *Playhouse Disney*. This programming includes critically acclaimed fare such as *Stanley* (teaching lessons about nature and science), *Little Einsteins* (highlighting classical music and famed works of art while offering information about nature, geography, and different cultures), *Mickey Mouse Clubhouse* (which includes an early math curriculum), *My Friends Tigger and Pooh* (teaching reflective thinking and problem-solving skills through characters based on classic children's literature), and *JoJo's Circus* (engaging children in active movement games while teaching rhythm, early mathematical patterns, and pro-social lessons).

II. The Commission Has Appropriately Left to Broadcasters' Discretion
The Choice of Weekday versus Weekend Programming.

The Commission's rules, as adopted in 1996, explicitly count as "core" E/I programming any qualifying programming that airs any day of the week between the hours of 7 AM and 10 PM. This was a narrowing of the time frame the Commission had proposed in its Notice of Proposed Rulemaking. The Commission determined that shortening the proposed 6 AM to 11 PM time frame by one hour on either end would "encourage broadcasters to air educational programming at times the maximum number of child viewers will be watching" and provided data about children's viewing habits to support its conclusion that those hours were the times with the greatest child viewership.¹⁰

CMPC says that the vast majority of the E/I programming that it found on the mostly network-affiliated commercial broadcast stations it surveyed in Los Angeles now

¹⁰ 1996 Report and Order, ¶ 99.

airs on weekends rather than weekdays. It demands a further change in the rules to provide that some of the programming relied on by commercial broadcast television stations to fulfill their core E/I programming requirement be aired on weekdays rather than weekends. However, it provides no data to show either (a) that children are more likely to be watching educational television programs on weekdays (when most children over a certain age are in school, doing homework and/or participating in after-school activities) than on weekends, or (b) that children interested in watching educational shows on weekdays do not have a variety of such shows available to them at those times from outlets other than those that were part of CMPC's narrowly focused survey.

E/I programs for children are in fact available on a wide variety of television outlets every day of the broadcast week. Children's cable television channels such as Disney Channel and Nickelodeon offer children's programming around the clock, seven days a week, and significant portions of it are educational. To cite only two examples, Disney Channel, which is available in 94 million U.S. homes, airs the *Playhouse Disney* pre-school-oriented educational programming block seven mornings a week for six hours at a time, while Nickelodeon offers the *Noggin* pre-school series daily from 6 AM to 6 PM ET. Weekday E/I programming for children of varying ages is also available on public television stations. And stations such as the ten ABC-owned stations that carry digital multicast programming on their D2 and D3 channels supplement the network E/I programming on their analog programming with additional E/I programming on their digital multicast channels and in some cases their analog channels that air at various times and on various days of the week. For children who are busy on weekdays but are looking for educational, informational and also entertaining programming on weekends,

when they have fewer school and homework responsibilities, commercial broadcast television stations offer a valuable alternative viewing opportunity.

III. ABC's Programs Fully Satisfy the Commission's Criteria
For Educational and Informational Programming.

A. ABC Has Affixed the E/I Label Only to Programs
That Pass a Rigorous Screening Procedure.

Those at ABC, Inc. and The Walt Disney Company entrusted with responsibility for children's programming, both broadcast and cable, have always been committed to working in concert to create entertaining, meaningful programs that children can enjoy and that parents can trust. Before attaching the E/I label to any of its children's shows, ABC has hired educational experts to review the programming and to make comments. No ABC program has been denominated E/I without those educators' careful scrutiny and input. With the help of its educational consultants, ABC has strived to create educational and informational programs and stories that enlighten while they entertain by focusing on relatable characters and issues while also helping children build strong relationships, empathy and values.

Although procedures have varied somewhat from program to program and year to year, a new series with potential to be a qualifying E/I series for the *ABC Kids* block has often been identified early in development, even before scripts have been written, because its pro-social elements, intent and characters have stood out. Next, one or more educational consultants has usually been asked to review the series overview and other written materials, or to screen a pilot or other sample of the program. These consultants, respected members of the academic community, specialize in the developmental needs of

children in *ABC Kids*' target audience. ABC has carefully considered their written critiques, insights and suggestions in deciding whether to pursue making a series an FCC-qualifying series. The process has been collaborative and has continued throughout the development of the series. As long as it appeared that the educational notes could be accomplished without substantially altering the nature of the series, the consultant attached to the series would continue to issue written notes to the show's Creative Executive at every script revision level, and also in response to storyboard and rough cuts. In other cases, programming that was already developed for cable and that appeared to have strong life lessons has been identified after the fact as having potential educational and informational value and has been presented to the educational consultants at a more completed stage for their consideration.

No program has been released for airing on *ABC Kids* with the E/I label until and unless an educational consultant has signed off on each finished episode. Not every series has consisted of 100% qualifying episodes, as occasionally a story has not lent itself to a clear "life lesson" message and has been removed from the list of potential qualifiers. These "just for fun" episodes, which have been deemed safe and appropriate viewing for children but have not met ABC's stricter standards for E/I programming, might air on Disney Channel, for example, but would not be scheduled on *ABC Kids*. All of the episodes that have aired on the "core" E/I block within *ABC Kids* have been certified as educational programming by the company's consultants.

In evaluating programming for potential qualifying status, ABC's educational consultants have taken an informed and realistic view of what it means for programming to be educational and effective. In the view of ABC and its consultants, educational and

informational programming is not limited to – indeed, can be most effective when it is not – earnest, pedantic, humorless programming that teaches children facts or figures or that imparts moral lessons in a scolding or finger-wagging way. Shortly after the new processing guidelines went into effect, John Arnold, one of the educational specialists who ABC hired to consult on its series, offered an ABC programming executive this summary of their shared perspective on what educational programming can mean:

‘[E]ducational programming’ is not confined to traditional content worth knowing; it also pertains to social and developmental issues of relevance to kids. Further, it connotes programming that piques the imagination and fosters curiosity; that causes one to analyze, evaluate, and consider different points of view. In short, it promotes intellectual growth. . . . Finally, there is no inherent conflict between what is educative and what is entertaining. Shakespeare, among others, taught us that long ago. And often children’s play involves more real thinking than does their school work.

B. ABC Utilizes Highly Qualified Educational Consultants
To Evaluate Its Children’s Programs for Possible E/I Status.

The ABC Television Network’s children’s series that ABC currently labels E/I have been developed in conjunction with highly credentialed experts in education and children’s intellectual and emotional development. The Network has utilized a number of educational consultants on its E/I programming over the years. Two experts – Dr. John Arnold and Dr. Arthur Pober – have consulted on the series currently airing as part of *ABC Kids*.

Dr. John Arnold, the educational consultant on *That’s So Raven*, has had 45 years of experience as a middle-level teacher, principal, professor and consultant. A former teacher and principal at Sidwell Friends Middle School in Washington, D.C. and research psychologist with the National Institutes of Health, he is now a middle-grade specialist as

well as a retired professor at North Carolina State University. He has served as a board member of the National Middle School Association; as founding chairman of the National Association of Independent Schools Middle School Task Force; as Director of Advisory Services for the Greater Boston Teacher Center; and as President, board member and journal editor of the North Carolina Middle School Association. He has published several books and numerous articles on exemplary middle school practice.

Dr. Arnold has also led workshops and worked with schools throughout the country. He has consulted with the Carnegie Commission's National Board for Professional Teaching Standards, and the Lilly Endowment, Inc., and has been a consultant on children's television programs for Nickelodeon, Hearst Animations and Evening Sky Productions as well as ABC, Inc. and The Walt Disney Company. He is a *magna cum laude*, Phi Beta Kappa graduate of Washington and Lee University, did graduate work in theology at Yale University Divinity School and in psychology at the University of Houston, received a certificate in clinical counseling from the New Jersey Neuropsychiatric Institute, and received his Ph.D in Administration and Curriculum from the University of Connecticut.

Dr. Arthur Pober, Ed.D., who has consulted with ABC on the current *ABC Kids* programs other than *That's So Raven*, has served as President and President Emeritus of the Entertainment Software Rating Board; as Vice President for the Children's Advertising Review Unit of the Council of Better Business Bureaus; as Principal of the Hunter College Elementary School, the oldest laboratory school for gifted children in the world; and as Director of Special Programs for the Board of Education of the City of New York. His numerous consultancies and directorships have included work for

Nickelodeon, Noggin, Sesame Workshop, Baby First Television, Viacom, Cartoon Network and Orion Pictures (on “Little Man Tate”) as well as ABC and Disney Channel. He has also served as a board member of Child Magazine and Nick Jr. Magazine, has consulted with the New York City Ballet and the Jewish Museum, has been a member of the educational panel of the National Teachers Awards for Metropolitan Opera Education, and has been an advance trainer for the Structure of the Intellect Intelligence Training Institute. He is a frequent panelist, moderator, lecturer, presenter and writer on various topics involving children’s television, violence in the media, children’s advertising, ratings, content regulation, and childhood education. He received a B.A. in psychology and English and an M.S. in guidance and counseling from Long Island University, an Advanced Specialist Certificate in Administration and Supervision from Brooklyn College, and a doctorate in Educational Administration and Supervision with a concentration in Educational Psychology and Organizational Development from Yeshiva University.

C. The E/I Programs on the *ABC Kids* Schedule
Are High-Quality Educational and Informational
Programs that Are Also Entertaining and Popular with Kids.

ABC’s educational consultants strongly stand behind the educational and informational nature of the E/I shows on the current *ABC Kids* schedule. They, and this company, believe that these programs, which are designed primarily for children in late elementary and middle school, help children in that delicate and confusing stage of life negotiate the fraught terrain of self-image, identity, popularity, standing up for oneself and one’s ideals, handling conflicts with friends, parents, siblings and teachers, and

developing positive habits and good values. The shows teach those lessons not by scolding or lecturing, which would likely turn off children of that age, but by telling entertaining stories involving relatable and often humorous characters who learn some valuable life lessons as they face familiar types of real-life quandaries, even if they and their friends and family members remain fallible and imperfect, and thus believable and human.

These *ABC Kids* programs have the virtue of being not only educational but also acclaimed by the industry for their high entertainment and production value and for the positive contributions they make to society. *That's So Raven*, for example, has won an Annual NAACP Image Award for Outstanding Children's Program (2007), Annual NAMIC (National Association for Multi-Ethnicity in Communications) Vision Awards for Best Children's Program (2006 and 2007), and an Annual Environmental Media Award (2004), and has received a seal of approval from Parent's Choice Awards (spring 2006); that show's star and other cast members have also received numerous awards and nominations. *The Suite Life of Zack & Cody* was nominated for Outstanding Children's Program in the 59th Annual Primetime Emmy Awards this year and for Outstanding Choreography in the 58th Annual Primetime Emmy Awards last year. In 2006 Eartha Kitt received a 34th Annual Annie Award for Outstanding Achievement in Voice Acting for her role in *Emperor's New School*, and her co-star Patrick Warburton was nominated the same year for the same award.

These programs are also tremendously popular with children, which means that children are actually watching and listening to the educational messages they impart. This year, *Hannah Montana* and its star, Miley Cyrus, won the 2007 Teen Choice

Awards for Choice Comedy TV Show and Choice Comedy Actress, respectively, and Miley Cyrus also won the Nickelodeon Teen Choice Awards as Favorite TV Actress. *The Suite Life of Zack & Cody* and its star, Cole Sprouse, were nominated for Favorite TV Show and Favorite TV Actor in the 2007 Nickelodeon Teen Choice Awards. *That's So Raven* was nominated for Favorite TV Show in the 2006 Nickelodeon Teen Choice Awards and for Choice TV Show in the 2004, 2005 and 2006 Teen Choice Awards. Its star, Raven-Symone, won Favorite TV Actress in the 2004 and 2005 Nickelodeon Teen Choice Awards and was nominated for the same honor again in 2006 and 2007. She also received nominations for Choice TV Comedy Actress in the 2004 and 2005 Teen Choice Awards.

D. CMPC's Descriptions of the *ABC Kids* Episodes
That It Recorded Are Inaccurate and Its Conclusions
Are Unjustified.

Of the five alleged ABC programs that CMPC recorded, only four ever aired as part of the *ABC Kids* block; as mentioned earlier, the episode of *That's So Raven* that CMPC recorded was not in fact identified as E/I and was never presented on *ABC Kids*. Those four programs that did air on KABC-TV as part of *ABC Kids*, and the strength and value of their educational lessons, are seriously mischaracterized in CMPC's comments.¹¹ For example:

- CMPC claims that the episode of *The Emperor's New School* that it reviewed does not show in sufficient detail the main character, Emperor-in-Training Kuzko, learning from the mistakes he makes in school. But part of the humor and educational value of this

¹¹ See Appendix, pp. 2-8.

show comes from viewing an exaggerated character that pre-teens will easily recognize as insecure, spoiled, self-involved, and lacking sensitivity to others, appreciation for differences, understanding for others' misfortune or personal obstacles, and respect for people and property struggling to stay in school (which he must if he is to become Emperor), to play by the rules, and to get along with others. Kuzko by nature lacks the social tools by which to fully mature and acknowledge his errors, but he does learn small lessons in subtle ways; in this episode, for example, he learns that rules must be applied fairly, and that playing pranks on potential competitors who threaten his vulnerable ego will only backfire. While Kuzko is a seriously flawed character, over the course of the series he does show growth and change. His caricatured personality is designed in part to help children recognize their own potential for brattiness and to see the pathetic absurdity and loneliness of someone who cannot move beyond those selfish tendencies.

- CMPC claims that the episode of *The Replacements* that it reviewed “presented an opportunity to provide a lesson about the humane treatment of animals or the ability of one person to make a big difference in the lives of others” but that “the only real message in this episode was simply to be happy with what you’ve got,” which it says is a “universal lesson in the series.” It is true that the series as a whole teaches that replacing authority figures whom Todd and Riley believe are to blame for their problems is not in fact a solution to their problems at all. But this particular episode – in which Riley objects to the conditions of the animals at the zoo and ultimately convinces the owner to move them to an animal preserve – also conveyed strong lessons about the treatment of animals and the ability of one person to make a difference. Similarly, the other segment in the show taught that while it may be appropriate to stand up to bullies who are

behaving violently toward smaller or younger people, patience and self-control are ultimately more valuable disciplines than violence, and the karate teacher who taught those values was a good teacher, while the requested “replacement” who advocated violence was a villain.

- CMPC claims that the *Hannah Montana* episode it reviewed had a “weak” educational message “about working hard and not giving up on something one wants to achieve” and that this lesson was undermined because, among other things, “Hannah earned a good grade simply for her studying technique, not because she had actually learned anything.” This is simply not true. In fact, the episode showed that Hannah, who had difficulty memorizing the names and locations of the many bones in the human body by studying in the conventional way, found a studying technique that worked for her – creating a rap song and dance about those bones. When she took the test and was trying to act out the song and dance to herself to remind herself of the answers, much as other students might recite to themselves their mnemonic devices, her teacher thought she was gesturing questions or answers to one of her classmates and gave her an F for cheating. But when Hannah performed the song and dance for her teacher, the teacher recognized that Hannah had not cheated, had found an original and creative study method that worked for her, and had in fact mastered all the material that was on the test, and the teacher changed Hannah’s grade to an A. This episode contained valuable life lessons about differing learning styles, the value of persistence and honesty, and the satisfaction one can obtain by mastering difficult material.

- CMPC claims that the episode of *The Suite Life of Zack and Cody* that it reviewed contained two “potential” socio-emotional lessons – “that one should appreciate family and that it’s often better to be honest with one’s feelings than to act tough” – but “also presented several anti-social behaviors such as lying (especially to police officers), being vain, not wearing a seatbelt, and not listening to adults.” CMPC fails to appreciate that the show was poking fun at and/or criticizing the clearly contemptible characters who engaged or sought to engage in the more outrageous behaviors. For example, when the vain and shallow London told the concierge, who was giving her a driving lesson, that she did not want to wear her seat belt because it would wrinkle her outfit, the concierge responded that wearing a seat belt was the law and required her to put it on before he would give her the lesson. He also taught her to adjust her rear-view mirrors not to admire her face but to see to the rear of the car. The maid, who frightened the children by driving too fast and then lied her way out of a speeding ticket, is also presented throughout this episode as a wholly inadequate character, as contrasted with more responsible adults such as Zack and Cody’s mother. And when Zack’s mother caught up with Zack, who had snuck away to camp to visit Cody, she threatened to ground him as punishment while also expressing relief that he was all right. But the overarching message of the episode was not about London or the maid or even about running away but about the subtle and multi-faced nature of sibling relationships with which so many children grapple. Zack found his brother Cody annoying, and thought he would be happy to have Cody out of his hair for two weeks, but then missed him when he was away, and had difficulty acknowledging to himself, to his mother or to Cody that he actually loved and missed his twin. This plotline helps children of a similar age come to grips with their

own conflicted feelings about their siblings and appreciate and acknowledge the fact that they still love and need the siblings who so often grate on their nerves.

CONCLUSION

The criteria promulgated and applied by the Commission for assessing whether a show qualifies as "core" E/I programming are appropriate and effective and should not be revised.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "John Zucker", written in a cursive style.

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